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**FILED**

DEC 21 2018

Clerk, U S District Court  
District Of Montana  
Billings

ATTORNEY FOR PLAINTIFF  
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SHAWN THOMAS CONRAD,

Defendant.

CR 18 - 151 -BLG- SPW

**INDICTMENT**

**SEXUAL EXPLOITATION  
OF A CHILD**

Title 18 U.S.C. § 2251(a) (Count I)  
(Penalty: Mandatory minimum 15 to  
30 years imprisonment, \$250,000 fine, five  
years to lifetime supervised release, and  
\$5,000 special assessment)

**POSSESSION OF CHILD  
PORNOGRAPHY**

Title 18 U.S.C. § 2252A(a)(5)(b)  
(Count II)  
(Penalty: 20 years imprisonment, \$250,000  
fine, five years to lifetime supervised  
release, and \$5,000 special assessment)

**FORFEITURE**

Title 18 U.S.C. § 2253(a)

THE GRAND JURY CHARGES:

COUNT I

That on or about August 3, 2018, at Billings, in Yellowstone County, in the State and District of Montana, the defendant, SHAWN THOMAS CONRAD, did employ, use, persuade, induce, entice, and coerce and attempt to employ, use, persuade, induce, entice and coerce any minor, Jane Doe, who is known to the defendant but whose name is withheld to protect her identity, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, that the visual depiction was transmitted using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and that the visual depiction was transported using any means and facility of interstate and foreign commerce in and affecting interstate and foreign commerce, in violation of 18 U.S.C. § 2251(a).

COUNT II

That on or about August 3, 2018, at Billings, in Yellowstone County, in the State and District of Montana, the defendant, SHAWN THOMAS CONRAD,

knowingly possessed any computer disk and any other material that contains an image of child pornography, as defined 18 U.S.C. § 2256(8), including an image of a prepubescent minor and minor who had not attained twelve (12) years of age, that had been shipped or transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including computer, in violation of 18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2).

#### FORFEITURE ALLEGATION

As a result of the commission of any of the crimes described above, and upon his conviction, the defendant, SHAWN THOMAS CONRAD, shall forfeit to the United States, pursuant to 18 U.S.C. § 2253(a), all right, title and interest in the following described property that represents property used to commit the offenses:

- Dell laptop, serial number D7YDN52, and
- Seagate GoFlex external hard drive, serial number NA0Q529P.

A TRUE BILL.

Foreperson signature redacted. Original document filed under seal.

  
KURT G. ALME  
United States Attorney

\_\_\_\_\_  
FOREPERSON

  
for JOSEPH E. THAGGARD  
Criminal Chief Assistant U.S. Attorney

Crim. Summons \_\_\_\_\_  
Warrant:  \_\_\_\_\_  
Bail: \_\_\_\_\_